

QUINN EMANUEL URQUHART & SULLIVAN, LLP

Charles K. Verhoeven (Bar No. 170151)

charlesverhoeven@quinnemanuel.com

David A. Perlson (Bar No. 209502)

davidperlson@quinnemanuel.com

Melissa Baily (Bar No. 237649)

melissabaily@quinnemanuel.com

John Neukom (Bar No. 275887)

johnneukom@quinnemanuel.com

Jordan Jaffe (Bar No. 254886)

jordanjaffe@quinnemanuel.com

50 California Street, 22nd Floor

San Francisco, California 94111-4788

Telephone: (415) 875-6600

Facsimile: (415) 875-6700

Attorneys for WAYMO LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

vs.

UBER TECHNOLOGIES, INC.;
OTTOMOTTO LLC; OTTO TRUCKING
LLC,

Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF LINDSAY COOPER
IN SUPPORT OF DEFENDANT OTTO
TRUCKING'S ADMINISTRATIVE
MOTION TO FILE UNDER SEAL
PORTIONS OF ITS MOTION TO
ENFORCE THE COURT'S JUNE 7, 2017
ORDER (DKT. 563) AND TO JOIN AND
ADOPT CO-DEFENDANTS UBER
TECHNOLOGIES, INC. AND
OTTOMOTTO LLC'S MOTION TO
ENFORCE THE COURT'S JUNE 7, 2017
ORDER (Dkt. 563) (DKT. 843)**

1 I, Lindsay Cooper, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,
4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Defendant Otto Trucking’s Administrative Motion
7 to Seal Portions of Its Motion To Enforce the Court’s June 7, 2017 Order (Dkt. 563) and To Join and
8 Adopt Co-Defendants Uber Technologies, Inc. and Ottotmotto LLC’s Motion to Enforce the Court’s
9 June 7, 2017 Order (Dkt. 563) (Dkt. 843) (the “Administrative Motion”). The Administrative Motion
10 seeks, in part, an order sealing highlighted portions of Exhibit 2 to the Declaration of Rachel M.
11 Walsh (“Exhibit 2”).

12 3. The highlighted portions of Exhibit 2 contain or reference trade secret and confidential
13 business information, which Waymo seeks to seal.

14 4. Exhibit 2 (highlighted portions) contains, references, and/or describes Waymo’s
15 asserted trade secrets. The information Waymo seeks to seal includes the confidential design and
16 functionality of Waymo’s proprietary autonomous vehicle system, which Waymo maintains as secret.
17 I understand that these trade secrets are maintained as secret by Waymo (Dkt. 25-47) and are valuable
18 as trade secrets to Waymo’s business (Dkt. 25-31). The public disclosure of this information would
19 give Waymo’s competitors access to descriptions of the functionality or features of Waymo’s
20 autonomous vehicle system. If such information were made public, I understand that Waymo’s
21 competitive standing would be significantly harmed.

22 5. Waymo’s request to seal is narrowly tailored to those portions of Exhibit 2 that merit
23 sealing.

1 I declare under penalty of perjury under the laws of the State of California and the United
2 States of America that the foregoing is true and correct, and that this declaration was executed in San
3 Francisco, California, on July 11, 2017.

4 By /s/ Lindsay Cooper
5 Lindsay Cooper
6 Attorneys for WAYMO LLC
7

8 **ATTESTATION**

9 In accordance with Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this
10 document has been obtained from Lindsay Cooper.
11

12 By: /s/ Charles K. Verhoeven
13 Charles K. Verhoeven
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